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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHRIS SMITH, CHERYL SMITH, KAREN
 SMITHSON, ALBERTO CORNEA, FRANK
 ORTEGA, MICHELLE ROGERS, DEBORAH
 CLASS, AMBER JONES, ALEXIS KEISER,
 LOORN SAELEE, THOMAS PEAR, and
 TANNAISHA SMALLWOOD, individually and
 on behalf of all other similarly situated
 individuals,

Plaintiffs,

v.

APPLE INC.,

Defendant.

No. 4:21-cv-09527-HSG

Third Declaration of Lucy Tufts in
 Support of Plaintiffs' Motion for Final
 Approval of Class Action Settlement

CLASS ACTION

Dept.: Courtroom 2
 Judge: Hon. Haywood S. Gilliam, Jr.

Date: April 10, 2025
 Time: 2:00 p.m.

Third Amended Complaint Filed: October
 31, 2023

1. My name is Lucy E. Tufts. I am attorney admitted to practice in the states of Alabama, Mississippi, and Georgia. I am a partner at the law firm of Cunningham Bounds, LLC, counsel of record for the Plaintiffs. I make this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement. I have personal knowledge of the facts set forth below and if called as a witness, could testify competently thereto.

2. Below is a summary of the approximate hours that each named Plaintiff spent participating in this case:

Date	Named Plaintiff	Time	Description
9/8/2020	Chris Smith	0.5	Took photographs of injuries
9/9/2020	Chris Smith	17.5	Online research regarding screen detachments, customer reviews, complaints, etc. (over several days)
10/14/2020	Chris Smith	0.25	Research on Apple Watch warranty through http://checkcoverage.apple.com
12/14/2020	Chris Smith	1.25	Brought watch to the Best Buy at Eastern Shore Center re: coverage for detached screen and Apple Screen Replacement Program
12/15/2020	Chris Smith	7.5	Research on Apple Watch Screen Replacement Program (over several days)
3/25/2021	Chris Smith	1.5	Met with Plaintiffs' Counsel
3/25/2021	Chris Smith	0.5	Photographs of injury/scar with investigator for Plaintiffs' Counsel
4/27/2021	Chris Smith	1.25	Collected and mailed Apple Watch accessories to Plaintiffs' Counsel
7/28/2021	Chris Smith	0.5	Reviewed and signed Attorney Representation Agreement
8/20/2021	Chris Smith	0.25	Reviewed and signed CLRA declaration
12/3/2021	Chris Smith	1.25	Reviewed the original Complaint
12/4/2021	Chris Smith	0.25	Communication with Plaintiffs' Counsel
7/26/2022	Chris Smith	0.25	Reviewed and signed a Request for Release of Information for medical records
8/14/2022	Chris Smith	0.5	Communication with Plaintiffs' Counsel
8/15/2022	Chris Smith	0.75	Collected documents for discovery responses (including photographs taken at hospital and Apple Watch receipt)
8/16/2022	Chris Smith	0.5	Communication with Plaintiffs' Counsel
8/22/2022	Chris Smith	1.25	Reviewed and approved discovery responses (ROGS, RFP & RFI)
9/6/2022	Chris Smith	1	Met with Plaintiffs' Counsel

1	3/16/2023	Chris Smith	0.5	Reviewed and approved the Second Amended Complaint
2	4/11/2023	Chris Smith	0.75	Reviewed and approved First Supplemental Discovery Responses (ROGS & RFP)
3	5/17/2023	Chris Smith	0.25	Communication with Plaintiffs' Counsel
4	5/19/2023	Chris Smith	0.5	Reviewed and approved Second Supplemental Discovery Responses (ROGS)
5	6/9/2023	Chris Smith	0.25	Reviewed and approved responses to Second ROGs & RFP
6	6/30/2023	Chris Smith	0.5	Reviewed and approved responses to First RFA
7	7/11/2023	Chris Smith	0.25	Communication with Plaintiffs' Counsel
8	7/13/2023	Chris Smith	0.5	Reviewed and approved responses to Apple's Third ROGS
9	8/24/2023	Chris Smith	0.5	Discussed scheduling and travel for deposition anticipated to be taken in San Francisco, CA
10	1/12/2024	Chris Smith	0.25	Reviewed update by Plaintiffs' Counsel
11	1/24/2024	Chris Smith	0.25	Reviewed update by Plaintiffs' Counsel
12	5/3/2024	Chris Smith	0.25	Reviewed update by Plaintiffs' Counsel
13	11/11/2024	Chris Smith	0.25	Reviewed update by Plaintiffs' Counsel
14	TOTAL		41.75	
15	2/9/2022	Deborah Class	1.5	Initial intake call with Plaintiffs' Counsel
16	2/10/2022	Deborah Class	0.75	Follow up phone call with Plaintiffs' Counsel
17	3/14/2022	Deborah Class	0.5	Review and sign representation agreement
18	3/26/2022	Deborah Class	1.75	Collected, packaged, and mailed watch to Plaintiffs' Counsel
19	8/18/2022	Deborah Class	1.25	Telephone conversation re: discovery responses
20	8/29/2022	Deborah Class	0.75	Reviewed and approved discovery responses (ROGS, RFP & RFI)
21	9/8/2022	Deborah Class	0.25	Reviewed case update by Plaintiffs' Counsel
22	3/16/2023	Deborah Class	0.5	Reviewed Second Amended Complaint
23	4/11/2023	Deborah Class	0.75	Reviewed and approved supplemental discovery responses (ROGS)
24	5/1/2023	Deborah Class	1.25	Searched for and produced proof of purchase of Apple Watch (CLASS0002)
25	5/4/2023	Deborah Class	0.5	Reviewed and approved second supplemental discovery responses
26	6/9/2023	Deborah Class	0.25	Reviewed and approved responses to Apple's Second RFP
27	6/21/2023	Deborah Class	0.25	Email communication with Plaintiffs' Counsel

THIRD DECL. OF LUCY TUFTS IN SUPPORT OF MOTION FOR FINAL APPROVAL
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1	8/4/2023	Deborah Class	0.25	Reviewed update by Plaintiffs' Counsel
	12/21/2023	Deborah Class	0.25	Reviewed update by Plaintiffs' Counsel
2	5/3/2024	Deborah Class	0.25	Reviewed update by Plaintiffs' Counsel
	11/11/2024	Deborah Class	0.25	Reviewed update by Plaintiffs' Counsel
3		TOTAL	11.25	
4	12/7/2021	Alberto Cornea	0.5	Initial email exchange
	12/14/2021	Alberto Cornea	1.25	Initial intake call with Plaintiffs' Counsel
5	3/1/2022	Alberto Cornea	0.5	Review and sign representation agreement
6	8/22/2022	Alberto Cornea	1	Telephone conversation re: discovery responses
7	8/25/2022	Alberto Cornea	1	Reviewed and approved discovery responses (ROGS, RFP & RFI)
8	9/8/2022	Alberto Cornea	0.25	Reviewed case update by Plaintiffs' Counsel
9	3/16/2023	Alberto Cornea	0.5	Reviewed Second Amended Complaint
10	4/11/2023	Alberto Cornea	0.75	Reviewed and approved supplemental discovery responses (ROGS)
11	5/16/2023	Alberto Cornea	0.5	Reviewed and approved second supplemental discovery responses (ROGS)
12	6/9/2023	Alberto Cornea	0.5	Reviewed and approved responses to Second ROGs & RFP
13	6/21/2023	Alberto Cornea	0.5	Email communications with Plaintiffs' Counsel
14	8/4/2023	Alberto Cornea	0.25	Reviewed update by Plaintiffs' Counsel
15	12/21/2023	Alberto Cornea	0.25	Reviewed update by Plaintiffs' Counsel
16	5/3/2024	Alberto Cornea	0.25	Reviewed update by Plaintiffs' Counsel
17	11/11/2024	Alberto Cornea	0.25	Reviewed update by Plaintiffs' Counsel
		TOTAL	8.25	
18	2/9/2022	Amber Jones	0.5	Initial email exchange
19	2/15/2022	Amber Jones	1.5	Initial intake call with Plaintiffs' Counsel
20	3/23/2022	Amber Jones	0.5	Review and sign representation agreement
21	5/26/2022	Amber Jones	1.5	Collected, packaged, and mailed watch to Plaintiffs' Counsel
22	8/5/2022	Amber Jones	0.25	Communication with Plaintiffs' Counsel
23	9/2/2022	Amber Jones	1	Reviewed and approved discovery responses (ROGS, RFP & RFI)
24	9/5/2022	Amber Jones	0.5	Communication with Plaintiffs' Counsel
25	9/8/2022	Amber Jones	0.25	Reviewed update by Plaintiffs' Counsel
26	3/16/2023	Amber Jones	0.75	Reviewed Second Amended Complaint
27	4/11/2023	Amber Jones	0.75	Reviewed and approved supplemental discovery responses (ROGS)

1	5/4/2023	Amber Jones	0.5	Reviewed and approved second supplemental discovery responses (ROGS)
2	6/6/2023	Amber Jones	0.5	Communication with Plaintiffs' Counsel
3	6/9/2023	Amber Jones	0.5	Reviewed and approved responses to Second ROGs & RFP
4	8/4/2023	Amber Jones	0.25	Reviewed update by Plaintiffs' Counsel
5	8/6/2023	Amber Jones	0.25	Communication with Plaintiffs' Counsel
6	12/13/2023	Amber Jones	0.25	Communication with Plaintiffs' Counsel
7	12/21/2023	Amber Jones	0.25	Reviewed update by Plaintiffs' Counsel
8	5/3/2024	Amber Jones	0.25	Reviewed update by Plaintiffs' Counsel
9	11/11/2024	Amber Jones	0.25	Reviewed update by Plaintiffs' Counsel
10	TOTAL		10.5	
11	7/1/2022	Alexis Keiser	0.25	Initial email exchange
12	2/2/2023	Alexis Keiser	1.5	Initial intake call with Plaintiffs' Counsel
13	2/26/2023	Alexis Keiser	0.5	Review and sign representation agreement
14	3/4/2023	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
15	3/8/2025	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
16	3/15/2023	Alexis Keiser	1	Collected, packaged, and mailed watch to Plaintiffs' Counsel
17	3/29/2023	Alexis Keiser	0.5	Communication with Plaintiffs' Counsel
18	4/11/2023	Alexis Keiser	0.75	Communication with Plaintiffs' Counsel
19	5/1/2023	Alexis Keiser	0.5	Communication with Plaintiffs' Counsel
20	5/18/2023	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
21	6/5/2023	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
22	6/27/2023	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
23	6/28/2023	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
24	6/30/2023	Alexis Keiser	1.25	Reviewed and approved discovery responses (ROGS & RFP)
25	7/5/2023	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
26	8/4/2023	Alexis Keiser	0.25	Reviewed update by Plaintiffs' Counsel
27	12/21/2023	Alexis Keiser	0.25	Reviewed update by Plaintiffs' Counsel
	5/3/2024	Alexis Keiser	0.25	Reviewed update by Plaintiffs' Counsel
	7/22/2024	Alexis Keiser	0.25	Reviewed update by Plaintiffs' Counsel
	8/7/2024	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
	9/24/2024	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
	11/11/2024	Alexis Keiser	0.25	Reviewed update by Plaintiffs' Counsel
	1/29/2025	Alexis Keiser	0.25	Communication with Plaintiffs' Counsel
	2/3/2025	Alexis Keiser	0.25	Reviewed update by Plaintiffs' Counsel
	TOTAL		10.25	
	2/9/2022	Frank Ortega	0.25	Initial email exchange
	3/3/2022	Frank Ortega	0.75	Initial intake call with Plaintiffs' Counsel

1	3/8/2022	Frank Ortega	0.5	Review and sign representation agreement
2	9/1/2022	Frank Ortega	1	Reviewed and approved discovery responses (ROGS, RFP & RFI)
3	9/8/2022	Frank Ortega	0.25	Reviewed update by Plaintiffs' Counsel
4	3/16/2023	Frank Ortega	0.5	Reviewed Second Amended Complaint
5	4/11/2023	Frank Ortega	0.5	Reviewed and approved supplemental discovery responses (ROGS)
6	5/16/2023	Frank Ortega	0.5	Reviewed and approved second supplemental discovery responses (ROGS)
7	6/9/2023	Frank Ortega	0.5	Reviewed and approved responses to Second ROGS & RFP
8	6/30/2023	Frank Ortega	0.5	Reviewed and approved responses to Apple's Third ROGS
9	8/4/2023	Frank Ortega	0.25	Reviewed update by Plaintiffs' Counsel
10	12/21/2023	Frank Ortega	0.25	Reviewed update by Plaintiffs' Counsel
11	5/3/2024	Frank Ortega	0.25	Reviewed update by Plaintiffs' Counsel
11	11/11/2024	Frank Ortega	0.25	Reviewed update by Plaintiffs' Counsel
12	TOTAL		6.25	
13	5/6/2022	Thomas Pear	0.25	Initial email exchange
14	5/11/2022	Thomas Pear	0.75	Initial intake call with Plaintiffs' Counsel
15	5/15/2022	Thomas Pear	0.5	Review and sign representation agreement
16	5/20/2022	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
17	5/26/2022	Thomas Pear	1	Collected, packaged, and mailed watch to Plaintiffs' Counsel
18	9/13/2022	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
19	11/14/2022	Thomas Pear	0.25	Reviewed update by Plaintiffs' Counsel
20	11/14/2022	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
21	11/16/2022	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
22	3/16/2023	Thomas Pear	0.5	Reviewed Second Amended Complaint
23	3/24/2023	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
24	6/7/2023	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
25	6/26/2023	Thomas Pear	0.5	Reviewed and approved discovery responses (ROGS & RFP)
26	6/30/2023	Thomas Pear	0.75	Reviewed and approved responses to Second ROGS & RFP/Third ROGS
27	7/7/2023	Thomas Pear	0.25	Reviewed update by Plaintiffs' Counsel
	7/7/2023	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
	7/27/2023	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
	8/4/2023	Thomas Pear	0.25	Reviewed update by Plaintiffs' Counsel
	8/4/2023	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
	12/4/2023	Thomas Pear	0.25	Reviewed update by Plaintiffs' Counsel
	12/21/2023	Thomas Pear	0.25	Reviewed update by Plaintiffs' Counsel

1	12/27/2023	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
	5/3/2024	Thomas Pear	0.25	Reviewed update by Plaintiffs' Counsel
2	11/11/2024	Thomas Pear	0.25	Reviewed update by Plaintiffs' Counsel
3	11/11/2024	Thomas Pear	0.25	Communication with Plaintiffs' Counsel
	TOTAL		8.5	
4	2/9/2022	Michelle Rogers	0.25	Initial email exchange
	2/15/2022	Michelle Rogers	0.75	Initial intake call with Plaintiffs' Counsel
5	3/14/2022	Michelle Rogers	0.5	Review and sign representation agreement
6	4/15/2022	Michelle Rogers	1	Collected, packaged, and mailed watch to Plaintiffs' Counsel
7	8/18/2022	Michelle Rogers	0.5	Provided information regarding discovery responses
8	8/31/2022	Michelle Rogers	0.5	Communication with Plaintiffs' Counsel
9	9/1/2022	Michelle Rogers	0.5	Reviewed and approved discovery responses (ROGS & RFP)
10	9/8/2022	Michelle Rogers	0.25	Reviewed update by Plaintiffs' Counsel
11	3/16/2023	Michelle Rogers	0.5	Reviewed Second Amended Complaint
12	4/11/2023	Michelle Rogers	0.5	Reviewed and approved supplemental discovery responses (ROGS)
13	5/8/2023	Michelle Rogers	0.5	Communication with Plaintiffs' Counsel
14	5/10/2023	Michelle Rogers	0.5	Reviewed and approved second supplemental discovery responses (ROGS)
15	6/6/2023	Michelle Rogers	0.25	Communication with Plaintiffs' Counsel
16	6/9/2023	Michelle Rogers	0.5	Reviewed and approved responses to Second ROGS/RFP
17	6/21/2023	Michelle Rogers	0.5	Communication with Plaintiffs' Counsel
18	6/30/2023	Michelle Rogers	0.5	Reviewed and approved responses to Apple's Third ROGS
19	8/3/2023	Michelle Rogers	0.5	Communication with Plaintiffs' Counsel
20	8/4/2023	Michelle Rogers	0.25	Communication with Plaintiffs' Counsel
21	12/21/2023	Michelle Rogers	0.25	Reviewed update by Plaintiffs' Counsel
22	5/3/2024	Michelle Rogers	0.25	Reviewed update by Plaintiffs' Counsel
23	11/11/2024	Michelle Rogers	0.25	Reviewed update by Plaintiffs' Counsel
	TOTAL		7.5	
24	7/1/2022	Loorn Saelee	0.25	Initial email exchange
25	2/2/2023	Loorn Saelee	0.75	Initial intake call with Plaintiffs' Counsel
26	3/4/2023	Loorn Saelee	0.5	Review and sign representation agreement
27	3/16/2023	Loorn Saelee	0.5	Reviewed Second Amended Complaint
	6/30/2023	Loorn Saelee	0.5	Reviewed and approved discovery responses (ROGS & RFP)
	8/4/2023	Loorn Saelee	0.25	Reviewed update by Plaintiffs' Counsel
	8/7/2023	Loorn Saelee	0.5	Communication with Plaintiffs' Counsel

1	12/21/2023	Loorn Saelee	0.25	Reviewed update by Plaintiffs' Counsel
	5/3/2024	Loorn Saelee	0.25	Reviewed update by Plaintiffs' Counsel
2	11/11/2024	Loorn Saelee	0.25	Reviewed update by Plaintiffs' Counsel
3		TOTAL	4	
	6/28/2022	Tannaisha Smallwood	0.25	Initial email exchange
4	1/31/2023	Tannaisha Smallwood	0.75	Initial intake call with Plaintiffs' Counsel
5	2/1/2023	Tannaisha Smallwood	0.5	Review and sign representation agreement
	3/7/2023	Tannaisha Smallwood	0.25	Communication with Plaintiffs' Counsel
6	3/14/2023	Tannaisha Smallwood	0.25	Communication with Plaintiffs' Counsel
7	3/14/2023	Tannaisha Smallwood	1	Collected, packaged, and mailed watch to Plaintiffs' Counsel
8	3/16/2023	Tannaisha Smallwood	0.5	Reviewed Second Amended Complaint
	3/29/2023	Tannaisha Smallwood	0.5	Communication with Plaintiffs' Counsel
9	4/5/2023	Tannaisha Smallwood	0.25	Communication with Plaintiffs' Counsel
10	4/10/2023	Tannaisha Smallwood	0.25	Communication with Plaintiffs' Counsel
	6/13/2023	Tannaisha Smallwood	0.5	Communication with Plaintiffs' Counsel
11	6/26/2023	Tannaisha Smallwood	1	Reviewed and approved initial discovery responses and Apple's second set of discovery requests
12	6/30/2023	Tannaisha Smallwood	0.5	Reviewed and approved responses to Apple's Third ROGS
13	7/25/2023	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
14	8/4/2023	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
15	10/9/2023	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
16	12/10/2023	Tannaisha Smallwood	0.5	Communication with Plaintiffs' Counsel
	12/21/2023	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
17	1/30/2024	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
	5/3/2024	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
18	10/28/2024	Tannaisha Smallwood	0.25	Communication with Plaintiffs' Counsel
19	10/31/2024	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
	12/10/2024	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
20	12/10/2024	Tannaisha Smallwood	0.25	Communication with Plaintiffs' Counsel
	3/5/2025	Tannaisha Smallwood	0.25	Reviewed update by Plaintiffs' Counsel
21		TOTAL	9.75	
22	7/16/2021	Cheryl Smith	0.75	Initial meeting with Plaintiffs' Counsel
23	7/23/2021	Cheryl Smith	0.5	Review and sign representation agreement
24	8/22/2022	Cheryl Smith	0.5	Reviewed and approved initial discovery responses
25	8/22/2022	Cheryl Smith	1	Collected, packaged, and mailed watch to Plaintiffs' Counsel
26	3/16/2023	Cheryl Smith	0.5	Reviewed Second Amended Complaint
27	4/11/2023	Cheryl Smith	0.5	Reviewed and approved supplemental discovery responses (ROGS)

THIRD DECL. OF LUCY TUFTS IN SUPPORT OF MOTION FOR FINAL APPROVAL
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1	5/19/2023	Cheryl Smith	0.5	Reviewed and approved second supplemental discovery responses (ROGS)
2	6/9/2023	Cheryl Smith	0.5	Reviewed and approved responses to Second ROGS/RFP
3	6/30/2023	Cheryl Smith	0.5	Reviewed and approved responses to Apple's Third ROGS
4	8/4/2023	Cheryl Smith	0.25	Reviewed update by Plaintiffs' Counsel
5	1/16/2024	Cheryl Smith	0.25	Reviewed update by Plaintiffs' Counsel
6	5/3/2024	Cheryl Smith	0.25	Reviewed update by Plaintiffs' Counsel
7	11/11/2024	Cheryl Smith	0.25	Reviewed update by Plaintiffs' Counsel
8	TOTAL		6.25	
9	9/13/2021	Karen Smithson	0.25	Initial email exchange
10	9/17/2021	Karen Smithson	0.75	Initial intake call with Plaintiffs' Counsel
11	10/5/2021	Karen Smithson	0.5	Review and sign representation agreement
12	8/23/2022	Karen Smithson	0.5	Reviewed and approved initial discovery responses
13	8/30/2022	Karen Smithson	1	Collected, packaged, and mailed watch to Plaintiffs' Counsel
14	3/16/2023	Karen Smithson	0.5	Reviewed Second Amended Complaint
15	4/11/2023	Karen Smithson	0.5	Reviewed and approved supplemental discovery responses (ROGS)
16	5/18/2023	Karen Smithson	0.5	Reviewed and approved second supplemental discovery responses (ROGS)
17	6/9/2023	Karen Smithson	0.5	Reviewed and approved responses to Second ROGS/RFP
18	6/30/2023	Karen Smithson	0.5	Reviewed and approved responses to Apple's Third ROGS
19	8/4/2023	Karen Smithson	0.25	Reviewed update by Plaintiffs' Counsel
20	12/21/2023	Karen Smithson	0.25	Reviewed update by Plaintiffs' Counsel
21	3/3/2024	Karen Smithson	0.25	Reviewed update by Plaintiffs' Counsel
22	11/11/2024	Karen Smithson	0.25	Reviewed update by Plaintiffs' Counsel
23	TOTAL		6.5	

3. The hours listed are likely substantially understated because the class representatives were not instructed to keep track of the time each spent on the case. The hours and task descriptions are provided as a good faith estimate of the time spent by each class representative based on records, including notes and emails, in Class Counsel's case file of what Class Counsel knows the class representatives did to help us complete specific tasks on specific dates.

1 I declare under penalty of perjury that this declaration is true and correct. Executed in
2 Mobile, Alabama this 30th day of April, 2025.

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4 /s/ Lucy E. Tufts
LUCY E. TUFTS

5 *Attorney for Plaintiffs and Settlement Class*
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